

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

FILED

AUG 28 2013

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

In the Matter of the Search of
the Express Mail package bearing label number EI832722372US,
addressed to: "Paula Fisher, 5432 Euclid, St. Louis, MO 63115," from:
"Sarah Cross, 1846 E. Fairmount, Phoenix, AZ 85016."

Case No. 4:13MJ05162 NAB

APPLICATION FOR A SEARCH WARRANT

I, Joseph L. Widlowski, a federal law enforcement officer or an attorney for the government
request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

the Express Mail package bearing label number EI832722372US, addressed to: "Paula Fisher, 5432 Euclid, St. Louis, MO 63115," from: "Sarah
Cross, 1846 E. Fairmount, Phoenix, AZ 85016."

located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States Currency

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21, U.S.C. Section(s) 841(a)(1) and
846

Offense Description

Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Joseph L. Widlowski
Applicant's signature

Joseph L. Widlowski, Postal Inspector,
United States Postal Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: August 28, 2013

City and state: St. Louis, MO

Nannette A. Baker
Judge's signature

Honorable Nannette A. Baker, U.S. Magistrate Judge

Printed name and title

AUSA: JEANNETTE S. GRAVISS

AFFIDAVIT

I, Joseph L. Widlowski, being duly sworn, state the following:

1. I have been employed by the United States Postal Inspection Service (USPIS) for the past ten (10) years. I have been assigned to narcotics investigations for the past seven (7) years and participated in numerous controlled substance investigations involving the transportation of controlled substances or proceeds through parcel delivery services, to include the United States Mails, as well as private delivery couriers such as United Parcel Service (UPS) and Federal Express (FedEx). Prior to this time period, I was employed with the Des Moines Police Department, Des Moines, Iowa, for approximately six (6) years. During that time, I participated in several narcotic investigations involving the transportation of controlled substances or proceeds of controlled substance sales as a canine handler. I have received training by the USPIS in the investigation of controlled substances or the proceeds of narcotics sales being transported through parcel delivery services.

2. I also rely upon the training and experience of other members of the USPIS St. Louis, Missouri Narcotics Team. The team is comprised of five members, two of whom have been assigned to narcotics for at least seven years. The St. Louis Narcotics Team has intercepted in excess of 1,500 packages which were found to have contained controlled substances or the proceeds of controlled substance sales.

3. Based on my training and experience and drug trafficking intelligence information gathered by the USPIS, I am aware that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances and proceeds. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail – overnight; Priority Mail – two day delivery), reliability, free telephone and internet package tracking

services, and the perception that there will be minimal chance of detection. I know that Express Mail and Priority Mail were originally intended for urgent business to business correspondence. Agency intelligence from prior packages, which were found to contain controlled substances or proceeds, has indicated that these labels are usually from an individual to an individual. Express Mail and Priority Mail are seldom used for individual to individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known 'sources' of controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or proceeds of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances or proceeds, indicated that these labels are usually from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or proceeds have displayed a business or company name, it has usually proven to be a fictitious business or company. Additionally, this analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: a package mailed from or addressed to a narcotic-source city; a package that has a fictitious return address; a package addressee name that is unknown at the destination address; a package sender name that is unknown at the return address; a package that has address information that is handwritten; a

package that is mailed from a Commercial Mail Receiving Agency (CMRA); a package that is addressed to residential areas; a package that is addressed from an individual to an individual; a package wrapped in brown paper and/or heavily taped; a package with an odor of masking agents; and a package bearing a sender zip code that is different than the zip code used in the return address.

5. The USPIS analysis of prior narcotics packages mailed through overnight delivery services has consistently shown that the identification of 'source' cities has proven to be one of several reliable characteristics used in identifying suspect packages. This analysis has also demonstrated that narcotics packages originating from states other than source locations have been consistently found to contain high-grade marijuana, psilocybin mushrooms or 'designer' drugs, such as Ecstasy, GBL, GHB, anabolic steroids, and other similar controlled substances. Generally such 'designer drugs' are not organic and are the product of a laboratory process.

6. The USPIS St. Louis, Missouri Narcotics Team has found the characteristics listed in the above paragraphs are indicative of packages that were found to contain illegal controlled substances or the proceeds for controlled substances.

7. On August 28, 2013, this affiant conducted a routine review of inbound Express Mail parcels at the USPS National Distribution Center (NDC) Hazelwood, Missouri. Incident to that review, I observed Express Mail package bearing label number EI832722372US, addressed to: Paula Fisher, 5432 Euclid, St. Louis, MO 63115, from: Sarah Cross, 1846 E. Fairmount, Phoenix, AZ 85016. The Postage Validation Imprint (PVI) on the package states that the package was mailed on August 27, 2013 at the Phoenix, Arizona 85018 Post Office.

8. Upon observing the package, I immediately noted the package bore a handwritten label and was addressed from an individual to an individual and the origin Zip Code was

different than the sender Zip Code. Further, I noted that the package was mailed from Phoenix, Arizona. Based on my training and experience, I know that Phoenix, Arizona is located in a known source area for narcotics.

9. According to a historical review of Postal Service records, I had documented four (4) previously mailed Express Mail packages addressed to: 5432 Euclid, St. Louis, MO 63115 between May 14, 2013 and July 1, 2013 as part of this investigation. Further, each of the previously mailed Express Mail packages was addressed to a different name: Christian Peters, Summer Green, Sabrina Cross, and Betty Green. Additionally, each of the previously mailed Express Mail packages bore different return addresses from Phoenix, Arizona; three of which bore the return addressee name 'Sarah Cross'. Based on my training and experience, I know that the Phoenix, Arizona area is located in a known source area for narcotics.

10. On August 28, 2013, I reviewed available law enforcement and Postal Service records and determined that 5432 Euclid, St. Louis, MO 63115 was a valid mailing address. However, I was unable to associate the last name of 'Fisher' with the address. On that same date, I contacted the St. Louis, MO 63115 Post Office and verified that 5432 Euclid, St. Louis, MO 63115 was a valid mailing address. However, I determined that 'Paula Fisher' was not known to receive mail at the address. I know based on my training and experience that drug traffickers will often utilize a fictitious addressee name in an effort to conceal their identity and avoid detection by law enforcement. Further, I know based on my training and experience that the use of a fictitious addressee name is a characteristic which is indicative of packages which, in the past, have contained controlled substances or the proceeds of controlled substance sales.

11. On August 28, 2013, I reviewed available law enforcement and Postal Service records and determined that 1846 E. Fairmount, Phoenix, AZ 85016, was not a valid mailing

address. On that same date, I contacted the Phoenix, AZ 85016 Post Office and verified that 1846 E. Fairmount, Phoenix, AZ 85016 was not a valid mailing address. I know based on my training and experience that drug traffickers will often utilize an unknown or fictitious sender address in an effort to conceal their identity and avoid detection by law enforcement. Further, I know based on my training and experience that the use of an unknown or fictitious sender address is a characteristic which is indicative of packages which, in the past, have contained controlled substances or the proceeds of controlled substance sales.

12. On August 28, 2013, Officer Katheryn Wiedemann, St. Louis Metropolitan Police Department, was contacted and responded to USPIS offices in St. Louis, MO. Officer Wiedemann was accompanied by her narcotic trained canine 'Sully'. The Express Mail package bearing label number EI832722372US was placed in an area known not to have been previously contaminated by a narcotic odor. Officer Wiedemann had 'Sully' search this area. Upon arriving at this package, Officer Wiedemann advised me that canine 'Sully' reacted in a positive manner, indicating the presence of a narcotic odor.

13. The package is a white cardboard box approximately nine (9) inches long, six (6) inches wide, and four (4) inches deep, weighing approximately one (1) pound, 6 (6) ounces. Based on my training and experience, as well as, the training and experience of other members of the USPIS, St. Louis, Missouri Narcotics Team, I know that the size and weight of this package, coupled with other indicators (i.e. handwritten label, fictitious sender address, fictitious addressee name, positive reaction by a narcotic trained canine) are indicative of other packages which have been found, in the past, to contain narcotic substances, or monies which are the proceeds of narcotic trafficking.

14. In the past, all of the above factors have been indicative of packages which

contained illegal controlled substances or monies which are the proceeds of narcotic trafficking. It is this affiant's belief that Express Mail package bearing label number EI832722372US will contain illegal controlled substances.

15. The package is currently in the custody of Postal Inspector J.L. Widlowski. Attached herewith is a photocopy of the Express Mail label bearing number EI832722372US, as well as a copy of Officer Wiedemann's canine 'Sully's' qualifications.

From:



01 032722372 US



\$35.95
Postage & Insurance

EXPRESS MAIL
Guaranteed delivery, money back guarantee

Post Office to Address

PERMIT NO. 1000 NEW YORK, NY 10001

01032722372 US

85013 3595
827 13 28
LUSK 3595
1-6 09

FROM: PLUM POINT

Carroll County
Village of Plum Point
New York 12550

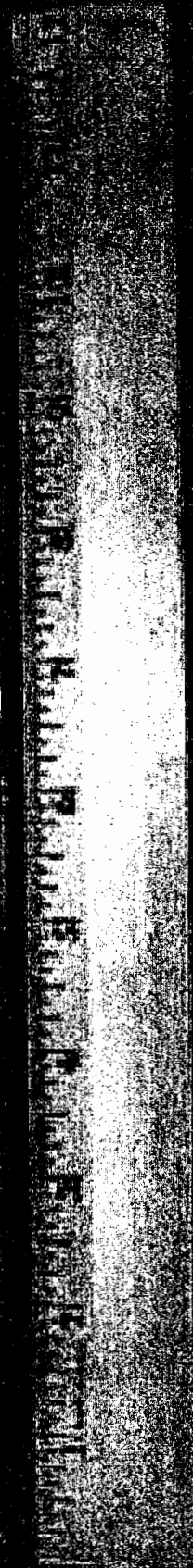
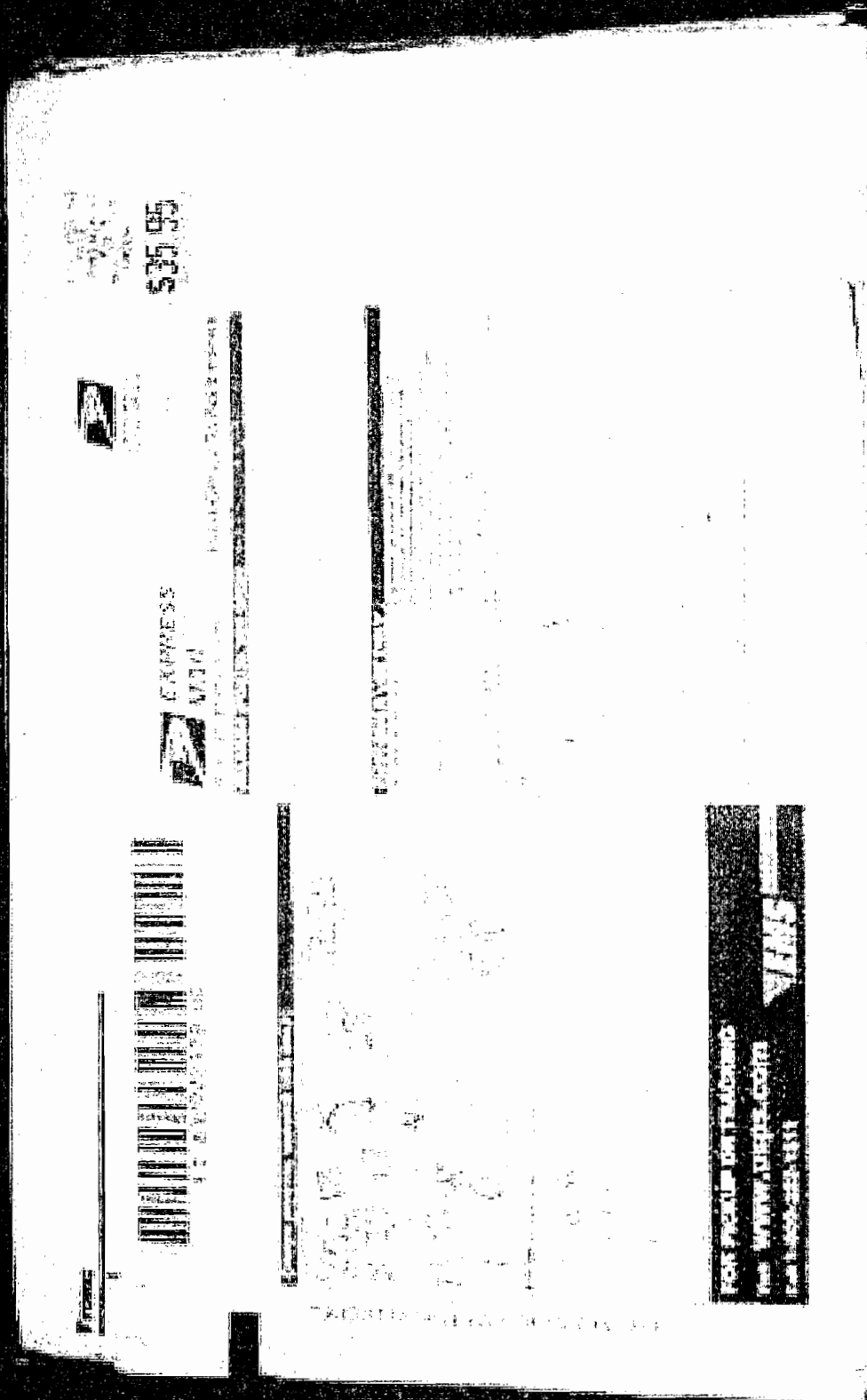
Tracy L. Hall
1000 1st St
New York, NY 10001

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Visit WWW.USPS.COM

Call 1-800-225-1811





METROPOLITAN POLICE DEPARTMENT – CITY OF ST. LOUIS

Intra-Department Report and Correspondence Sheet

Date: February 13, 2012
To: All Parties
From: P.O.Katheryn Wiedemann Canine Section
Subject: K-9 Sully Qualifications
Copies:

The following information is in regards to K-9 Sully a aggressive alert, narcotic/patrol dog:

Name: Sully

Breed: German Shepherd

Age: 7yrs.

K-9 Sully graduated from the St. Louis Metropolitan Police Department Canine School in July 2008 with his handler P.O. Katheryn Wiedemann.

Sully is a Narcotic/Patrol canine that is trained in the following narcotic substances: Marijuana, Cocaine, Crack Cocaine, Methamphetamine, Heroin, LSD, Mushrooms & Black Tar.

K-9 Sully and I train at least two times a month and he is certified with Missouri Police Canine Association and North American Police Working Dog Association in narcotics and patrol. Also, we are members of the United States Police Canine Association.

In the past four years K-9 Sully and I have assisted the United States Postal Inspectors with numerous searches. He has alerted on over 1,000lbs. of Marijuana as well as other illegal narcotics. In addition he has also alerted on over \$12,000.00 in U.S. Currency.

All training information and records are documented and retained at St. Louis Metropolitan Police Canine School located at 13300 Bellfontaine rd. St. Louis, MO. 63044

P.O. Katheryn Wiedemann 4096/462 Canine Section
Bureau of Support Operations
St. Louis Metropolitan Police Department